



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
ENFORCEMENT AND  
COMPLIANCE ASSURANCE

NOV 15 2016

Genevieve Walker  
Director of Environmental Compliance  
First Responder Network Authority  
U.S. Department of Commerce  
12201 Sunrise Valley Dr. M/S 243  
Reston, VA 20192

Subject: Draft Programmatic Environmental Impact Statement on the Nationwide Public Safety  
Broadband Network for the Western United States, CEQ # 20160209

Dear Ms. Walker:

In accordance with our responsibilities under Section 309 of the Clean Air Act, the National Environmental Policy Act (NEPA), and the Council on Environmental Quality regulations for implementing NEPA, the U.S. Environmental Protection Agency (EPA) has completed its review of the First Responder Network Authority (FirstNet), draft Programmatic Environmental Impact Statement (PEIS). The draft PEIS analyses the impacts of the construction and operation of a nationwide public safety broadband network (NPSBN) in the western United States.

The NPSBN will address a critical national infrastructure need for a nationwide network to allow law enforcement personnel, fire fighters, emergency medical service professionals, and other public safety entities to communicate across agencies and jurisdictions. The draft PEIS is the fourth in a series that covers five geographic regions across the U.S. This draft PEIS covers the western United States and includes the states of Arizona, California, Idaho, Nevada, Oregon and Washington.

The draft PEIS analyzed three alternatives: 1) Preferred Alternative, 2) Deployable Technologies Only Alternative, and 3) No Action Alternative. FirstNet selected the Preferred Alternative. Under the Preferred Alternative, FirstNet would construct a nationwide broadband Long Term Evolution (LTE) network using a combination of wired, wireless, deployable, and satellite technologies. This may include, but is not limited to: colocation of network equipment and new infrastructure.

Based on our review, EPA rates the Preferred Alternative an **LO**. The “LO” rating signifies that the draft PEIS review did not identify any potential environmental impacts requiring substantive changes to the Preferred Alternative.

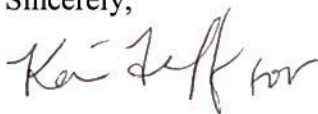
We offer a few comments regarding the Climate Change discussion. The draft PEIS references the Council on Environmental Quality’s 2014 Revised Draft *Guidance for Federal Departments and Agencies on Consideration of Greenhouse Gas Emissions and the Effects of Climate Change in National Environmental Policy Act Reviews* (GHG Guidance). CEQ finalized the GHG Guidance on August 1, 2016. We recommend revising the GHG and climate change analysis to remove the 25,000 metric tons of CO<sub>2</sub>-e reference point and ensure overall consistency with the 2016 Final GHG Guidance.

Further, the draft PEIS states on Page 54, under *ES-5.14 Climate Change*, “GHG emissions would be emitted locally but likely have a minimal effect globally.” This is not the appropriate way to consider GHG emissions. As CEQ explains in the Guidance, such comparisons are “not an appropriate method for characterizing the potential impacts associated with a proposed action and its alternatives and mitigations because this approach does not reveal anything beyond the nature of the climate change itself: the fact that diverse individual sources of emissions each make a relatively small addition to global atmospheric GHG concentrations that collectively have a large impact.”<sup>1</sup> EPA recommends that FirstNet follow the approach outlined by the CEQ’s Final Guidance regarding the analysis of greenhouse gas emissions and climate change and remove this inappropriate comparison.

The EPA Rating System Criteria is located at  
<http://www.epa.gov/compliance/nepa/comments/ratings.html>.

We appreciate the opportunity to review the draft PEIS and look forward to reviewing the final PEIS. The staff contact for the review is Arthur Totten and he can be reached at (202) 564-7164.

Sincerely,

A handwritten signature in black ink, appearing to read "Rob Tomiak", written over a horizontal line.

Rob Tomiak  
Director  
Office of Federal Activities

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<sup>1</sup> Final GHG Guidance, p.11.